

RESPONSE: Plaintiff originally filed in State Court (Common Pleas) and this action was removed by these Defendants due to Plaintiff's allegations that Defendants violated federal statutes and constitutional law. These Defendants deny said allegations. The substantial part of the events giving rise to the allegations of the Plaintiff's Complaint occurred in Spartanburg County.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action.

RESPONSE: No.

(F) If the Defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleadings reflecting the correct identification.

RESPONSE: On information and belief, these Defendants are properly identified.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of their liability.

RESPONSE: These Defendants are not aware of any additional parties who should be named as Defendants in this case at this time.

(H) In an action in which jurisdiction is based on diversity under 28 U.S.C. § 1332(a), a party or intervenor must, unless the court orders otherwise, name – and identify the citizenship of – every individual or entity whose citizenship is attributed to that party or intervenor. This response must be supplemented when any later event occurs that could affect the court's jurisdiction under § 1332(a).

RESPONSE: Not Applicable.

Willson Jones Carter & Baxley, P.A.

s/Charles F. Turner, Jr.

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Spartanburg, SC

March 6, 2024